

**From:** [Smith, DavidW](#)  
**To:** [Kerner, Maureen](#); [Geoff Brosseau](#)  
**Cc:** [Porse, Erik](#); [Currier, Brian](#); [Salt, Danielle](#); [karen.cowan@casqa.org](mailto:karen.cowan@casqa.org)  
**Subject:** RE: OWP\_EFC Stormwater Costs Report  
**Date:** Friday, April 17, 2020 4:22:00 PM  
**Attachments:** [image001.png](#)

---

Greetings

One of the joys of working at home during this shelter in place is working with my cranky laptop, which just blue screened on me when I was about to hit "send" on my comments on this most interesting report. Errrg!

That said, I'm providing some very informal comments for your consideration.

I want to commend you for a great job working with a very difficult data set to develop some very interesting evaluation work. We really need better information on stormwater program costs because the paucity of good data on stormwater costs is an important impediment in state and local efforts to secure more reliable funding for these programs.

It seemed clear from reading the report twice that you struggled with data quantity and quality issues. I think you provided pretty up front and prominent cautions about these issues.

It's clear from this and similar cost reporting that there are no standardized methods or expectations for reporting stormwater program funding needs and actual expenditures. This has resulted in a grab bag of data that are really difficult to meaningfully compare. The report highlights some of those key areas where the data are particularly suspect. For example, it was striking to see 1/3 of costs associated with "pollution prevention". I agree with your assessment that much O&M spending is being allocated to this category. I think it includes so many unrelated areas of expenditure to be almost meaningless as a really discreet cost category in my view.

While I REALLY wanted to be able to rely heavily upon the assessments in this report for several purposes, in the end I'm left feeling that the data quantity and quality issues (principally related to underrepresentation of parts of the state and the inconsistencies in reporting categories and expectations) are significant enough that we should not view the report's results as reliable for use in precise characterization of stormwater program budgeting and costs. However, I think the results can be responsibly used at a higher, more qualitative level to inform conversations about stormwater program costs, needs, and funding going forward.

I agree with most of CASQA's useful comments and, in particular, with the observation that if there is a move to require more consistent, higher quality program cost/budget reporting (a move that EPA would support), that should be done in close coordination with the regulated communities. It's clear, particularly for smaller Phase II communities, that we're just not set up to track these budgets and costs in ways that lend themselves to robust categorization. So doing better with cost accounting and reporting would be tough. But I would suggest that without better data, efforts to make the business case about the need for more program funding at local and statewide levels and assert our ability to make wise use of available funds will be hamstrung.

I just have a couple of specific observations. I believe it would be particularly useful to find a way to require or otherwise obtain better data distinguishing costs of flood control from other stormwater program costs. I also believe it would be useful to obtain better data allocating costs to projects and activities associated with TMDL implementation. As presented here, the data do not support widely made arguments about the costs of TMDL implementation (recognizing of course that many of those costs will be faced in the future). I was also very struck by the data indicating that actual spending has been essentially flat in most programs for several years. I know CASQA raised concerns about the accuracy of those data (at least for San Diego), but it would be useful to carefully check those data in particular. Finally, it would be interesting and useful to stratify results to distinguish costs and budgets of Phase I vs Phase II MS4 programs to help evaluate the differences in the budget realities between them. I know the range of requirements in the various Phase I programs in CA is wide, but I continue to believe we need to focus more on Phase II program financial realities and needs.

That said, I think you accomplished a lot here with a very difficult set of raw material to work with. Sorry to be so late with these comments. I look forward to seeing the final report and sharing it with a wide array of folks around the country.

Take care and stay safe and sane during these weird times.

Dave

David Smith  
Assistant Director  
Water Division  
Tribal and State Assistance Branch  
EPA Region 9  
75 Hawthorne Street (WTR-3)  
San Francisco, CA 94105  
415.972.3464 (direct)  
415.238.4139 (mobile)

---

**From:** Kerner, Maureen <maureen.kerner@owp.csus.edu>  
**Sent:** Friday, April 17, 2020 2:33 PM  
**To:** Geoff Brosseau <geoff.brosseau@casqa.org>  
**Cc:** Porse, Erik <erik.porse@owp.csus.edu>; Currier, Brian <brian.currier@owp.csus.edu>; Salt, Danielle <danielle.salt@owp.csus.edu>; Smith, DavidW <Smith.DavidW@epa.gov>; karen.cowan@casqa.org  
**Subject:** RE: OWP\_EFC Stormwater Costs Report

Hi Geoff,

Thanks so very much to you and CASQA for taking time to review the paper and provide these comments. We are for sure adding an upfront section highlighting the limitations and qualifiers of the findings. For example we only used data that was “readily” and publicly available (i.e. data from SMARTS or posted on websites, plus reports provided from the LA Regional Board). The data we have is by no means comprehensive of all the data that is out there; we recently learned there is a lot of data from the North Coast, it just wasn’t publicly available.

We appreciate, too, the specifics on the San Diego discrepancies. I’m having my team look into this and sort it out.

Finally, yes parsing out costs into categories is challenging and there are likely lots of inaccurate assumptions on our part. This is one of our key findings – how one person defines a cost may be very different from how someone else interprets what activities are covered by it.

Lots of improvements to be clarified here, as well as be addressed/considered in the future STORMS project.

*Maureen*  
*916-278-8117*

---

**From:** Geoff Brosseau <[geoff.brosseau@casqa.org](mailto:geoff.brosseau@casqa.org)>  
**Sent:** Friday, April 17, 2020 12:59 PM  
**To:** Kerner, Maureen <[maureen.kerner@owp.csus.edu](mailto:maureen.kerner@owp.csus.edu)>  
**Cc:** Porse, Erik <[erik.porse@owp.csus.edu](mailto:erik.porse@owp.csus.edu)>; Currier, Brian <[brian.currier@owp.csus.edu](mailto:brian.currier@owp.csus.edu)>; Salt, Danielle <[danielle.salt@owp.csus.edu](mailto:danielle.salt@owp.csus.edu)>; Smith, DavidW <[Smith.DavidW@epa.gov](mailto:Smith.DavidW@epa.gov)>; [karen.cowan@casqa.org](mailto:karen.cowan@casqa.org)  
**Subject:** Re: OWP\_EFC Stormwater Costs Report

Maureen,

Thank you for the opportunity to review and provide comments on the subject report.

And thank you for the extra time – we all can use it these days.

Geoff

Geoff Brosseau  
Executive Director  
California Stormwater Quality Association (CASQA)  
P.O. Box 2105  
Menlo Park, CA 94026-2105  
650-366-1042 (Voicemail)  
650-365-8620 (Direct)  
[geoff.brosseau@casqa.org](mailto:geoff.brosseau@casqa.org)  
[www.casqa.org](http://www.casqa.org)

CASQA is a 501(c)(3) non-profit organization dedicated to the advancement of stormwater quality management, science, and regulation.

---

**From:** Maureen Kerner <[maureen.kerner@owp.csus.edu](mailto:maureen.kerner@owp.csus.edu)>  
**Date:** Monday, April 13, 2020 at 2:38 PM  
**To:** Geoff Brosseau <[geoff.brosseau@casqa.org](mailto:geoff.brosseau@casqa.org)>  
**Cc:** "Porse, Erik" <[erik.porse@owp.csus.edu](mailto:erik.porse@owp.csus.edu)>, Brian Currier <[brian.currier@owp.csus.edu](mailto:brian.currier@owp.csus.edu)>, "Salt, Danielle" <[danielle.salt@owp.csus.edu](mailto:danielle.salt@owp.csus.edu)>, David Smith <[Smith.DavidW@epa.gov](mailto:Smith.DavidW@epa.gov)>, Karen Cowan <[karen.cowan@casqa.org](mailto:karen.cowan@casqa.org)>  
**Subject:** RE: OWP\_EFC Stormwater Costs Report

Hi Geoff and Dave,

Just checking in on your reviews of OWP's costs report. I can extend the comment letter date to this Friday, but will need to cut you off then so we can finalize and distribute next week.

Sending you wishes of health and hope,

*Maureen*  
*916-278-8117*

---

**From:** Kerner, Maureen  
**Sent:** Friday, March 20, 2020 2:53 PM  
**To:** Geoff Brosseau <[geoff.brosseau@casqa.org](mailto:geoff.brosseau@casqa.org)>  
**Cc:** Porse, Erik <[erik.porse@owp.csus.edu](mailto:erik.porse@owp.csus.edu)>; Currier, Brian <[brian.currier@owp.csus.edu](mailto:brian.currier@owp.csus.edu)>; Salt, Danielle <[danielle.salt@owp.csus.edu](mailto:danielle.salt@owp.csus.edu)>; Smith, DavidW <[Smith.DavidW@epa.gov](mailto:Smith.DavidW@epa.gov)>; [karen.cowan@casqa.org](mailto:karen.cowan@casqa.org)  
**Subject:** RE: OWP\_EFC Stormwater Costs Report

Geoff, that is fine. Thank you.

*Maureen*  
*916-278-8117*

---

**From:** Geoff Brosseau <[geoff.brosseau@casqa.org](mailto:geoff.brosseau@casqa.org)>  
**Sent:** Friday, March 20, 2020 2:35 PM  
**To:** Kerner, Maureen <[maureen.kerner@owp.csus.edu](mailto:maureen.kerner@owp.csus.edu)>  
**Cc:** Porse, Erik <[erik.porse@owp.csus.edu](mailto:erik.porse@owp.csus.edu)>; Currier, Brian <[brian.currier@owp.csus.edu](mailto:brian.currier@owp.csus.edu)>; Salt, Danielle <[danielle.salt@owp.csus.edu](mailto:danielle.salt@owp.csus.edu)>; Smith, DavidW <[Smith.DavidW@epa.gov](mailto:Smith.DavidW@epa.gov)>; [karen.cowan@casqa.org](mailto:karen.cowan@casqa.org)  
**Subject:** Re: OWP\_EFC Stormwater Costs Report

Maureen,

Thank you for the opportunity to review and comment.

I would like to send this out to MS4 program managers – both Phase I and Phase II – to better inform our comments.

But before I do I want check to make sure that would be OK with you all...?

Thanks! Geoff

Geoff Brosseau  
Executive Director  
California Stormwater Quality Association (CASQA)  
P.O. Box 2105  
Menlo Park, CA 94026-2105  
650-366-1042 (Voicemail)  
650-365-8620 (Direct)  
[geoff.brosseau@casqa.org](mailto:geoff.brosseau@casqa.org)  
[www.casqa.org](http://www.casqa.org)

CASQA is a 501(c)(3) non-profit organization dedicated to the advancement of stormwater quality management, science, and regulation.

---

**From:** Maureen Kerner <[maureen.kerner@owp.csus.edu](mailto:maureen.kerner@owp.csus.edu)>

**Date:** Thursday, March 19, 2020 at 5:35 PM

**To:** David Smith <[Smith.DavidW@epa.gov](mailto:Smith.DavidW@epa.gov)>, Karen Cowan <[karen.cowan@casqa.org](mailto:karen.cowan@casqa.org)>, Geoff Brosseau <[geoff.brosseau@casqa.org](mailto:geoff.brosseau@casqa.org)>

**Cc:** "Porse, Erik" <[erik.porse@owp.csus.edu](mailto:erik.porse@owp.csus.edu)>, Brian Currier <[brian.currier@owp.csus.edu](mailto:brian.currier@owp.csus.edu)>, "Salt, Danielle" <[danielle.salt@owp.csus.edu](mailto:danielle.salt@owp.csus.edu)>

**Subject:** OWP\_EFC Stormwater Costs Report

Dear Geoff, Dave, and Karen,

Attached is our long awaited summary of reported stormwater costs in CA. This Draft Final version is currently being routed internally for final editing. We do not have the capacity at this time to do further analysis or sufficiently address stakeholder comments. However, as we do of course value CASQA's and EPA's insight, we invite you to take a look and perhaps provide formal comment letters we could include as attachments so that such perspectives can carry forward with this document as the Water Board and others continue to evaluate costs.

With that, I'd request that such letters be provided by April 10. We plan to finalize and distribute on April 15.

Many thanks! Hope you are all staying healthy and productive.

Maureen



**Maureen Kerner, P.E.**

*Research Engineer*

[OWP at Sacramento State](#)

*Associate Director*

[Environmental Finance Center at Sacramento State](#)

**Direct:** 916-278-8117

[maureen.kerner@owp.csus.edu](mailto:maureen.kerner@owp.csus.edu)